

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

OLIVIA Y., et al	)	
	)	
Plaintiffs	)	
	)	
v.	)	CIVIL ACTION NO. 3:04-cv-251-HSO-FKB
	)	
TATE REEVES, as Governor of	)	
the State of Mississippi, et al.	)	
	)	
Defendants	)	

**JOINT MOTION TO STAY THE 2<sup>ND</sup> MSA AND TO  
ENTER A JOINT STIPULATED ORDER FOR 2<sup>ND</sup> MSA REBUILDING PERIOD**

Plaintiffs and Defendants file this Joint Motion to Stay the 2<sup>nd</sup> Modified Mississippi Settlement Agreement and Reform Plan (“2<sup>nd</sup> MSA”) and to Enter a Joint Stipulated Order for 2<sup>nd</sup> MSA Rebuilding Period:

1. The 2<sup>nd</sup> MSA was entered by the Court on December 19, 2016 and went into effect on January 1, 2018.
2. A telephonic status conference was held in this matter on May 19, 2021. During the status conference, the Court directed the parties to file joint or individual motions for hearing including representations as to what topics should be covered during the hearing.
3. The parties agree that the 2<sup>nd</sup> MSA should be stayed, all pending motions should be stayed, and a defined rebuilding period (“Rebuilding Period”) should be implemented in a joint stipulated order to move the Mississippi Department of Child Protection Services (“MDCPS”) toward the overall goal of improving foster care services to children in Mississippi.

4. The parties, in consultation with the Monitor, have agreed to a Joint Stipulated Order for 2<sup>nd</sup> MSA Rebuilding Period which will be presented to the Court separately as required by the Local Rules.

5. The parties agree that any hearing scheduled by the Court should be for the sole purpose of reviewing the Joint Stipulated Order agreed to by the parties.

WHEREFORE, the parties request that the Court schedule a hearing to consider and enter the agreed upon Joint Stipulated Order for 2<sup>nd</sup> MSA Rebuilding Period.

RESPECTFULLY SUBMITTED, this the 22<sup>nd</sup> day of June, 2021.

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